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MAY 15 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

May 15, 1998

Ex Parte

Ms. Magalie R. Salas
Secretary
Federal Communication Commission
Room 222
1919 M. Street, N.W.
Washington, D.C. 20554

Re: CC Docket No. 80-286, Jurisdictional Separations Reform and Referral to the Federal-State Joint Board

CC Docket No. 96-45 Federal-State Joint Board on Universal Service

CC Docket No. 96-262, Access Charge Reform

CCB/CPD CC Docket No. 97-30, Request by ALTS for Clarification of the Commission's Rules Regarding Reciprocal Compensation for Information Service Provider Traffic

Dear Ms. Salas:

Please be advised that on Wednesday, May 13, 1998, Mr. Paul Cooper and Mr. Stan Brower, of SBC Telecommunications, Inc., were contacted by Craig Brown, Andy Firth, Sharon Weber, and Steven Burnett of the Accounting Policy Division regarding some questions the FCC had concerning Internet Service Provider (ISP) usage, as a follow-up to the ex parte meeting on May 11, 1998. Additionally, this discussion was held to respond to the FCC's questions concerning the materials filed with this Commission on Friday, May 8, 1998, in reference to the issues surrounding ISP usage.

In response to Mr. Brown's request, the two attachments are being furnished to illustrate the usage measurement points of interstate ISP traffic originated by an Incumbent Local Exchange Carrier customer and sent to a CLEC for transport to an ISP and beyond to the Internet. In the examples enclosed, the ISP usage is measured on the originating or line side of the local switch.

As discussed in our ex parte meeting on May 11, 1998, SBC Communications Inc.'s telephone companies are working to deploy measurement capabilities in its network to identify and measure ISP traffic on a broader scale; not only for ISP/CLEC traffic, but also for usage measurements for ISPs behind other ILECs and ISPs served by the switches of Southwestern Bell Telephone Company, Pacific Bell and Nevada Bell.

Please include this letter and the attachments in the record of these proceedings in accordance with Section 1.1206(a)(1) of the Commission's Rules.

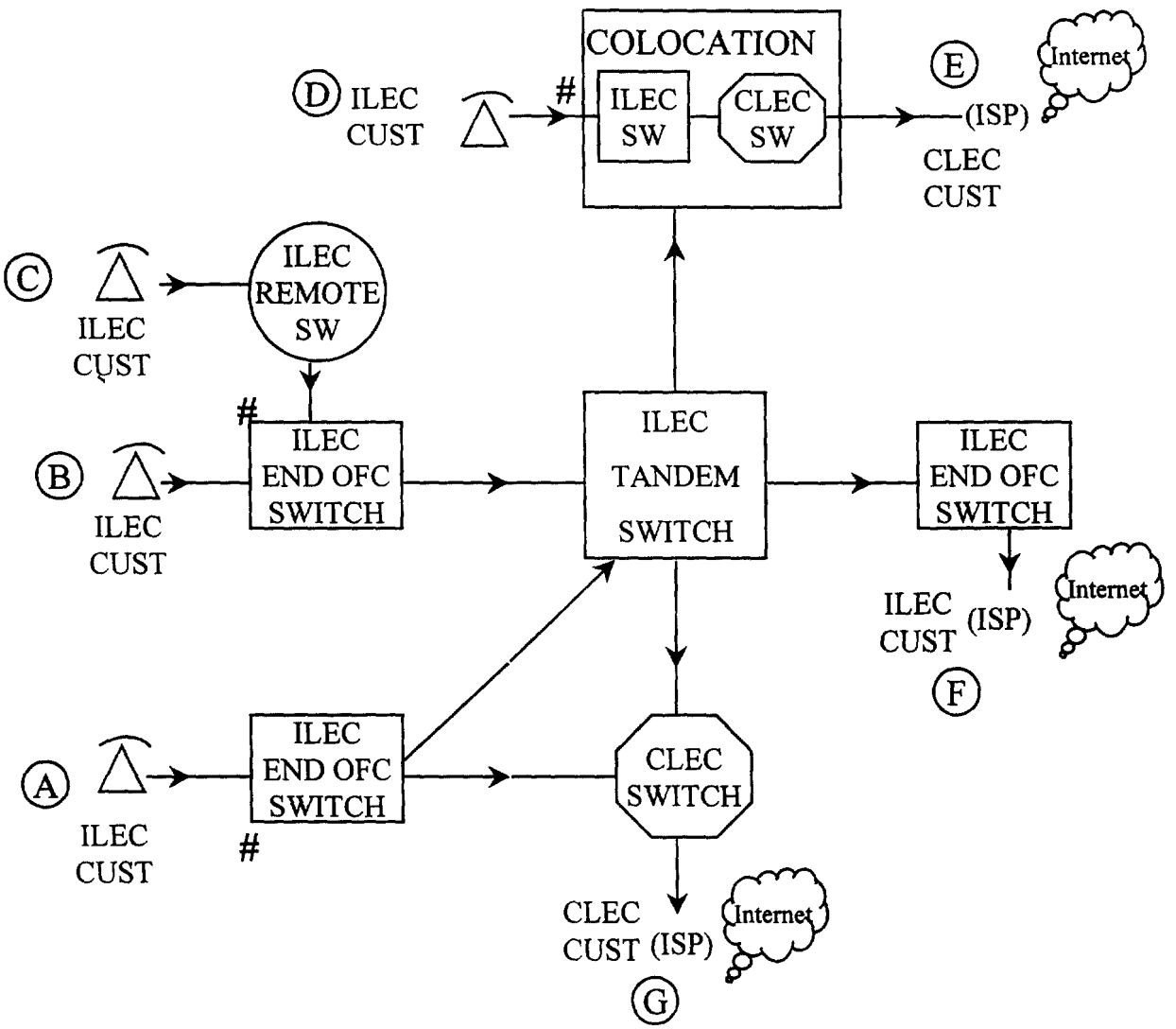
Acknowledgement and date of receipt of this transmittal are requested. A duplicate transmittal letter is attached for this purpose.

If you have questions concerning these measurement efforts, please feel free to contact Paul Cooper at 314-235-8111.

Sincerely,

Attachments

INTERCONNECTION DIAGRAM



Originating Traffic Measurement Point

→ Call Direction

CLEC - Competitive Local Exchange Carrier

ILEC - Incumbent Local Exchange Carrier

ISP - Internet Service Provider

The attached interconnection diagram indicates the points for measuring switched minutes on the telephone network for calls originating from Incumbent Local Exchange Carrier customers A, B, C, D and delivered to one of three Internet Service Providers at E, F or G. For example:

Call from A and delivered to F or G, measured at A.

Call from B and delivered to F or G, measured at B.

Call from C (served by a remote switch) , measured at B.

Call from D and delivered to colocated CLEC switch E, is measured at D.